

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

| | | |
|---|----------|--------------------------------|
| In re: | : | Chapter 11 |
| | : | |
| LEHMAN BROTHERS HOLDINGS INC., et al., | : | Case No. 08-13555 (SCC) |
| | : | |
| Debtors. | : | (Jointly Administered) |
| | : | |
| | x | |

**ORDER ESTIMATING CLAIMS FOR RESERVE PURPOSES AND
GRANTING RELIEF FROM PROTOCOL ORDER**

Upon the cross-motion of Wilmington Trust, National Association, solely in its capacity as Trustee (the “**Trustee**”) of the Structured Asset Securities Corporation Mortgage Pass-Through Certificates, Series 2006-S4 Trust (the “**Trust**”) for entry of an order (1) estimating its claims for reserve purposes at the full value of those claims and (2) relieving the Trustee and Lehman Brothers Holdings Inc. (“**LBHI**”) from Steps 3 and 4 of the Protocol Order and setting a date for adjudication of the Trustee’s claims on the merits, dated February 28, 2018 (the “**Cross-Motion**”); and the Court having jurisdiction to consider the Cross-Motion; and venue being proper before this Court; and due and proper notice of the Cross-Motion having been provided to the parties identified in the Cross-Motion; and it appearing that the relief sought in the Cross-Motion is in the best interests of the efficient administration of estate assets; and after due deliberation and sufficient cause appearing therefore, it is:

ORDERED that the Cross-Motion is granted as provided herein; and it is further

ORDERED that the Trust’s claims shall be estimated at their full value for reserve purposes; and it is further

ORDERED that the Trustee and LBHI are hereby relieved from Steps 3 and 4 of the Protocol Order; and it is further

ORDERED that within thirty days from the date of entry of this Order the Trustee and

LBHI will meet and confer to negotiate in good faith the terms of a joint scheduling order that provides sufficient time for fact and expert discovery in advance of a binding adjudication of the Trustee's RMBS Claims on the merits either by this Court or by a mutually agreed-upon third-party neutral; and it is further

ORDERED that within thirty days from the date of entry of this Order, the Trustee and LBHI shall submit a proposed joint scheduling order to this Court, including an identification of any terms on which the parties have been unable to reach an agreement; thereafter, this Court shall notice a scheduling conference to hear and determine all matters relating to the proposed joint scheduling order; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York
[_____] , 2018

Honorable Shelley C. Chapman
United States Bankruptcy Judge